



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

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February 17, 2000

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EIS001652

Ms. Wendy R. Dixon, EIS Program Manager
Yucca Mountain Site Characterization Office
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
P.O. Box 30307, M/S 010
North Las Vegas, NV 89036-0307

Re: Draft Environmental Impact Statement for a Geologic Repository
for the Disposal of Spent Nuclear Fuel and High-Level Radioactive
Waste at Yucca Mountain, Nye County, Nevada
64 Fed. Reg. 44200 (August 13, 1999);
Docket: DOE/EIS-0250D

Dear Ms. Dixon:

Enclosed please find an original and three copies of the Comments of the
Pennsylvania Public Utility Commission in the above-referenced proceeding.

*rec'd original only
by 2/23*

Should there be any questions regarding these Comments, please do not hesitate to
call me at (717) 772-8579.

Thank you for your attention to this letter.

Very truly yours,

Lawrence F. Barth
Assistant Counsel

Attachment

BEFORE THE
UNITED STATES DEPARTMENT OF ENERGY

Draft Environmental Impact Statement for a)	
Geologic Repository for the Disposal of Spent)	Docket:
Nuclear Fuel and High-Level Radioactive Waste)	DOE/EIS-0250D
at Yucca Mountain, Nye County, Nevada)	
64 Fed. Reg. 44200 (August 13, 1999))	

COMMENTS OF THE PENNSYLVANIA
PUBLIC UTILITY COMMISSION

Introduction

Pursuant to the Notice published in the Federal Register on August 13, 1999 (64 Fed. Reg. 44200 (August 13, 1999)), the Pennsylvania Public Utility Commission (Pennsylvania Commission) offers the following Comments in support of the Proposed Action set forth in the Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada (DEIS).

Comments

Although the DEIS offers the "no-action alternative" as a baseline against which to judge the Proposed Action, the Pennsylvania Commission believes that this alternative offers a coldly realistic picture of why construction of a repository is needed as quickly as possible. This is particularly true with respect to Pennsylvania which relies more than most other states on electricity generated at nuclear power stations. The safety of the people of the Commonwealth depends

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upon the continued safe operation of these nuclear generating stations. This includes the removal of spent nuclear fuel from the reactor sites by the federal government as promised by Congress in the Nuclear Waste Policy Act.

2

Currently, there are nine commercial operating reactors generating electricity at five stations in the Commonwealth. Only one other state (Illinois) has a greater number of operating reactors. Thirty-six percent of the electricity used in Pennsylvania is generated by nuclear energy.

Because these nine commercial reactors operating at five generating stations (Limerick, Peach Bottom, Susquehanna, Three Mile Island and Beaver Valley) were constructed by electric utilities to produce electricity, they were built fairly close to the markets they were intended to serve. This puts them near population centers across the Commonwealth and makes the long-term or permanent storage of highly radioactive spent nuclear fuel potentially very hazardous.

The storage facilities at these plants were never intended to be operated in perpetuity. They were not built to be operated safely on a permanent or even long-term basis. Like other nuclear plants across the country, some of these plants have already begun to build dry cask storage because their storage pools are filled to design capacity. Under the "no-action alternative," the potential for loss of life is greater if spent fuel remains at the generating stations on a long-term basis, especially if institutional control ends after 100 years.

3 There are also economic reasons why construction of a permanent repository is needed. Storing spent nuclear fuel at the reactor site, as the "no action alternatives" indicate, is an expensive proposition. If DOE does not build the repository facilities soon, utilities will incur additional costs through the fact that they will have to store more spent fuel for a longer period of time. The DEIS shows that the construction of a repository at Yucca Mountain is by far the least expensive alternative.

If the Proposed Action plan is followed, the construction, operation and eventual closing of a permanent storage facility will cost \$28.8 billion in 1998 dollars over the life of the project. Under the two scenarios set forth in the no-action alternative, the cost would be between \$51.5 billion and \$56.7 billion during the first 100 years. The estimated cost for the remaining period (9,900 years) of the first scenario would run between \$480 million and \$529 billion per year. The relatively low cost of building the Yucca Mountain repository, when compared with the alternatives, makes sense.

4 Moreover, the space available for storage of spent nuclear fuel at the generating stations is limited. Even if some utilities are able to expand their own storage facilities, there will come a point when no additional storage is available and the operators will have to shut the reactors down permanently. As generation is taken off the market, the available supply is diminished and the prices for the remaining energy sources will increase. This will hit customers hard who are trying to replace the power lost with the closing of nuclear generators.

Also, on an economic note, Pennsylvania ratepayers have already paid \$1 billion into the Nuclear Waste Fund which was established through the Nuclear Waste Policy Act to pay for the construction of a permanent repository. To date, approximately \$16 billion has been collected through a surcharge on electricity generated by nuclear power plants and \$6 billion has been spent by DOE. The Pennsylvania ratepayers who have paid into this fund have an interest in seeing that the money is spent for what it was intended as do all customers who have relied on electricity generated by nuclear power.

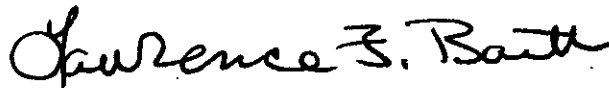
Conclusion

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The analysis in the DEIS does not identify any reason based on safety, environmental or other concerns which would prevent DOE from going forward with the Yucca Mountain project. The Pennsylvania Public Utility Commission agrees with the Proposed Action and urges the Department of Energy to proceed with it as expeditiously as possible.

Respectfully submitted,



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Deputy Chief Counsel

Bohdan R. Pankiw
Chief Counsel

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Date: February 17, 2000